

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

) CC Docket No. 92-237

Administration of the )

North American Numbering Plan )

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**U S WEST, INC. FURTHER REPLY COMMENTS**

I. INTRODUCTION

U S WEST, Inc. ("U S WEST") hereby responds to the further comments filed in the above-referenced docket,<sup>1</sup> concerning the six-year transition for the expansion from three to four digits of Feature Group D carrier identification codes ("CIC").<sup>2</sup> The majority of commenters agree with U S WEST that ending the permissive dialing period earlier than the six years initially proposed by the Federal Communications Commission ("Commission") is necessary in order to meet the increasing need for CICs resulting from the enactment of the 1996

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<sup>1</sup> Comments filed herein, May 21, 1996, include: AT&T Corp. ("AT&T"); Bell Atlantic; BellSouth Telecommunications, Inc. ("BellSouth"); Cincinnati Bell Telephone Company ("Cincinnati Bell"); GTE Service Corporation ("GTE"); The NYNEX Telephone Companies ("NYNEX"); Pacific Telesis Group ("PacTel"); SBC Communications Inc. ("SBC") and U S WEST.

<sup>2</sup> Public Notice, Further Comments, Carrier Identification Codes, CC Docket No. 92-237, DA 96-678, rel. Apr. 30, 1996.

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Telecommunications Act.<sup>3</sup> Of most immediate concern to commenters, however, is the lifting of the one-to-an-entity restriction currently placed on the distribution of CICs. These reply comments underscore the need to lift that restriction.

## II. THE RESTRICTION ON CICS MUST END IMMEDIATELY

As U S WEST discussed in its further comments, pursuant to Commission directive, the North American Numbering Plan Administration ("NANPA") is currently prohibited from assigning a CIC to any entity that already holds one or more codes.<sup>4</sup> Because such a policy poses a barrier to new competitive entry, U S WEST urged the Commission to lift the restriction immediately. No one opposed lifting the restriction, and in fact, the comments clearly support U S WEST's position.<sup>5</sup>

Like U S WEST, AT&T notes that "the unique problem that triggered [ ] imposition [of the restriction] has been resolved."<sup>6</sup> Moreover, AT&T demonstrates, as does U S WEST, that there is an immediate need for assignment of additional

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<sup>3</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (or "1996 Act"). See BellSouth at 2; SBC at 4; GTE at 1-3; NYNEX at 3-4; Bell Atlantic at 1; PacTel at 5-6; Cincinnati Bell at 2-3.

<sup>4</sup> U S WEST at 2. There is a limited exception to the restriction. The NANPA may assign a CIC when an entity requires it to accommodate intraLATA presubscription. Id. at 3.

<sup>5</sup> See AT&T at 7-8; BellSouth at 4-5; SBC at 3-4; GTE at 3-4; PacTel at 3.

<sup>6</sup> AT&T at 4. See also U S WEST at 2; BellSouth at 5; PacTel at 2.

CIC codes,<sup>7</sup> noting that existing carriers are unable to provide customers with additional benefits without the use of CICs.<sup>8</sup> In the same vein, BellSouth adds that there must be a balance between CIC assignment and legitimate business needs consistent with industry guidelines and the 1996 Act.<sup>9</sup> Further, continuation of the one-CIC-per-entity restriction also negatively impacts competition; new entrants are unable to take advantage of the full complement of routing and billing efficiencies enjoyed by multi-CIC competitors.<sup>10</sup> For all of these reasons, U S WEST urges the Commission to lift the restriction on assignment of CICs immediately.

As a final matter, U S WEST notes that any remaining perceived need for the current restriction can be satisfied once the permissive dialing period ends. The current restriction was put in place in an attempt to conserve the limited number of CICs available during the transition from three- to four-digit CICs.<sup>11</sup> If the permissive period were to end today, over 8,400 additional CICs would be available for assignment. Thus, once the permissive period ends, there will no longer be a need for a penurious conservation program.<sup>12</sup> Accordingly, U S WEST urges the Commission to terminate the permissive period by the end of 1996.<sup>13</sup>

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<sup>7</sup> AT&T at 7-8; U S WEST at 3-5.

<sup>8</sup> AT&T at 7-8. See also PacTel at 3.

<sup>9</sup> BellSouth at 5.

<sup>10</sup> GTE at 3. See also PacTel at 3.

<sup>11</sup> See U S WEST at 8 n.16.

<sup>12</sup> Id. See also GTE at 3; PacTel at 3.

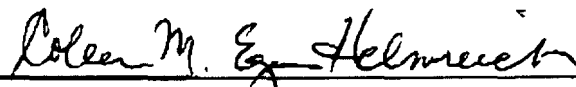
<sup>13</sup> See U S WEST at 2; GTE at 4; SBC at 1.

### III. CONCLUSION

The commenters in this proceeding make it clear that the current restriction on access to CICs must immediately be lifted. Commenters also agree that the goals of the Telecommunications Act of 1996 warrant shortening the initially proposed six-year permissive dialing period.

Respectfully submitted,

U S WEST, INC.

By:   
Coleen M. Egan Helmreich  
Suite 700  
1020 19th Street, N.W.  
Washington, DC 20036  
(303) 672-2737


Its Attorney

Of Counsel,  
Dan L. Poole

May 28, 1996

## **CERTIFICATE OF SERVICE**

I, Rebecca Ward, do hereby certify that on this 28th day of May, 1996, I have caused a copy of the foregoing **U S WEST, INC. FURTHER REPLY COMMENTS** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.

  
\_\_\_\_\_  
Rebecca Ward

**\*Via Hand-Delivery**

\_\_\_\_\_  
(CC92237D.COS/CH/lh)

\*James H. Quello  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, DC 20554

\*Reed E. Hundt  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, DC 20554

\*Susan P. Ness  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, DC 20554

\*Rachelle B. Chong  
Federal Communications Commission  
Room 844  
1919 M Street, N.W.  
Washington, DC 20554

\*Geraldine Matise  
Federal Communications Commission  
Room 235  
2000 M Street, N.W.  
Washington, DC 20554

\*Network Services Division  
Federal Communications Commission  
Room 235  
2000 M Street, N.W.  
Washington, DC 20554  
(2 copies)

\*Regina M. Keeney  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, DC 20554

\*David Ward  
Federal Communications Commission  
Room 210N  
2000 M Street, N.W.  
Washington, DC 20554

\*Mary DeLuca  
Federal Communications Commission  
Room 210R  
2000 M Street, N.W.  
Washington, DC 20554

\*Elizabeth Nightingale  
Federal Communications Commission  
Room 210K  
2000 M Street, N.W.  
Washington, DC 20554

\*International Transcription  
Services, Inc.  
Suite 140  
2100 M Street, N.W.  
Washington, DC 20037

James D. Ellis  
Robert M. Lynch  
David F. Brown  
SBC Communications, Inc.  
Room 1254  
175 East Houston  
San Antonio, TX 78205

Durward D. Dupre  
J. Paul Walters, Jr.  
Southwestern Bell Telephone Company  
Room 3520  
One Bell Center  
St. Louis, MO 63101

Margaret E. Garber  
Pacific Telesis Group  
4th Floor  
1275 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Marlin D. Ard  
Nancy C. Woolf  
Pacific Telesis Group  
Room 1523  
140 New Montgomery Street  
San Francisco, CA 94105

Campbell Ayling  
NYNEX Corporation  
1111 Westchester Avenue  
White Plains, NY 10604

Julia A. Waysdorf  
Swidler & Berlin, Chartered  
Suite 300  
3000 K Street, N.W.  
Washington, DC 20007

TCGI

Michael G. Hoffman  
VarTec Telecom, Inc.  
3200 West Pleasant Run Road  
Lancaster, TX 75146

Loretta J. Garcia  
Donald J. Elardo  
MCI Telecommunications Corporation  
1801 Pennsylvania Avenue, N.W.  
Washington, DC 20006

David J. Gudino  
GTE Service Corporation  
Suite 1200  
1850 M Street, N.W.  
Washington, DC 20036

Thomas E. Taylor  
Christopher J. Wilson  
Frost & Jacobs  
2500 Central Trust Center  
201 East Fifth Street  
Cincinnati, OH 45202

M. Robert Sutherland  
Theodore R. Kingsley  
BellSouth Corporation  
Suite 1700  
1155 Peachtree Street, N.E.  
Atlanta, GA 30309-2641

John M. Goodman  
Bell Atlantic Telephone Companies  
1133 20th Street, N.W.  
Washington, DC 20036

Judy Sello  
Mark C. Rosenblum  
Roy E. Hoffinger  
AT&T Corp.  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920

(CC92237D.CH/lh)  
Last Update: 5/24/96